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*Attorneys for X Corp.,*  
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United States of America,  Plaintiff,  vs.  Twitter, Inc.,  Defendant.	Case No. 3:22-cv-3070-TSH  <b>DECLARATION OF RENATO LEITE MONTEIRO IN SUPPORT OF X CORP.'S ADMINISTRATIVE MOTION TO SEAL</b>  The Hon. Thomas S. Hixson
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2                   **DECLARATION OF RENATO MONTEIRO**  
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4                   I, Renato Leite Monteiro, declare as follows:  
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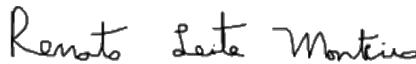
6                   1. I am the Global Head of Privacy, Global Data Protection Officer, and Senior Legal  
7 Director for X Corp., successor in interest to Defendant Twitter, Inc. I make this declaration based  
8 on personal knowledge and, if called as a witness, I could and would testify competently to the  
9 matters set forth herein. I make this declaration in support of X Corp.’s Administrative Motion to  
10 File Under Seal Certain Documents in Support of X Corp.’s Reply In Support of Motion for  
11 Protective Order & Relief From Consent Order (the “Administrative Motion”).  
12

13                   2. I understand that, by the Administrative Motion, X Corp. seeks to file under seal  
14 certain attachments to its Reply in Support of Motion for Protective Order & Relief From Consent  
15 Order, including a copy of a Cybersecurity Assessment prepared for X Corp. by the consulting firm  
16 FTI Consulting.  
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18                   3. I am familiar with FTI Consulting’s Cybersecurity Assessment by virtue of my role  
19 at X Corp. I am aware that it contains information about X Corp.’s privacy and security technology,  
20 processes, policies, and procedures that X Corp. keeps confidential in the normal course of business.  
X Corp. keeps such information confidential for a number of reasons, including in order to  
21 (1) prevent bad actors from gaining insight into how the company’s systems operate, which could  
22 be used to identify potential exploits or penetrations, and (2) prevent competitor businesses from  
23 gaining a competitive advantage by learning information about X Corp.’s systems and procedures  
that X Corp. lacks about its competitors.  
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25                   I declare under penalty of perjury under the laws of the United States of America that the  
26 foregoing is true and correct.  
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28 DATED: 10/10/2023

  
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Renato Leite Monteiro